

David M. Eisenberg  
ERMAN, TEICHER, MILLER,  
ZUCKER & FREEDMAN, P.C.  
400 Galleria Officentre, Ste. 444  
Southfield, MI 48034  
Tel: 248/827-4100  
Fax: 248/827-4106  
[deisenberg@ermantericher.com](mailto:deisenberg@ermantericher.com)

**Hearing Date: February 10, 2010 at 9:45 a.m (EST)**  
**Opposition Due By February 3, 2010 at 4:00 p.m. (EST)**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

<hr/>	)	<b>Chapter 11</b>
<b>In re:</b>	)	<b>Case No. 09-50026 (REG)</b>
MOTORS LIQUIDATION COMPANY., <i>et al.</i> ,	)	<b>Hon. Robert E. Gerber</b>
f/k/a GENERAL MOTORS CORP., <i>et al.</i> ,	)	
	)	
<b>Debtors.</b>	)	<b>(Jointly Administered)</b>
<hr/>	)	

**NOTICE OF MOTION TO WITHDRAW  
AS COUNSEL FOR NIDEC MOTORS & ACTUATORS**

PLEASE TAKE NOTICE that, pursuant to their Motion submitted herewith, Movants, Erman, Teicher, Miller, Zucker & Freedman, P.C. (“Movants”), will move this Court, before the Honorable Robert E. Gerber, United States Bankruptcy Judge, in Courtroom 621 at the United States Bankruptcy Court for the Southern District of New York, Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004, on **February 10, 2010, at 9:45 a.m.**, for an order authorizing the withdrawal of Erman, Teicher, Miller, Zucker & Freedman, P.C., as counsel for Nidec Motors & Actuators.

PLEASE TAKE FURTHER NOTICE that if you wish to oppose or respond to the Motion, you may oppose the Motion at the Hearing and/or file a written objection with the Bankruptcy Court.

PLEASE TAKE FURTHER NOTICE that any written response or objection to the Motion must be in writing, conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, and be filed with the United States Bankruptcy Court electronically in accordance with General Order M-242 by registered users of the Bankruptcy Court's electronic case filing system and, by all other parties in interest, on 3.5 inch disk preferable in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard copy delivered directly to Chambers) and shall be served in accordance with General Order M-242 upon: (1) Erman, Teicher, Miller, Zucker & Freedman, P.C., 400 Galleria Officentre, Suite 444, Southfield, MI 48034 (Attn: David M. Eisenberg, Esq.); (2) Weil, Gotshall & Manges LLP, 767 Fifth Ave., New York, NY 10153, counsel to the Debtors, (Attn: Harvey R. Miller, Esq.); (3) the Debtors c/o Motors Liquidation Company, 200 Renaissance Center, Detroit, MI 48165 (Attn: Ted Stenger); (4) General Motors Company, 300 Renaissance Center, Detroit, MI 48265 (Attn: Lawrence S. Buonomo, Esq.); (5) Cadwalader, Wickersham & Taft LLP, attorneys for the United States Department of the Treasury, One World Financial Center, New York, NY 10281 (Attn: John J. Rapisardi, Esq.); (6) the United States Department of the Treasury, 1500 Pennsylvania Ave. NW, Room 2312, Washington, DC 20220 (Attn: Matthew Feldman); (7) Vedder Price, P.C., attorneys for Export Development Canada, 1633 Broadway, 47<sup>th</sup> Floor, New York, NY 10019 (Attn: Michael J. Edelman, Esq. and Michael L. Schein, Esq.); (8) Kramer Levin Naftalis & Frankel LLP, 1177 Avenue of the Americas, New York, NY 10036, attorneys for the Unsecured Creditors' Committee (Attn: Thomas Moers Mayer, Esq. (facsimile 212-715-8000)); and (9) the Office of the United States Trustee, 33 Whitehall Street, 21<sup>st</sup> Floor, New York, NY 10004 (Attn: Diana G. Adams, Esq./Brian Masumoto, Esq.), so as to be actually received no later than 4:00 p.m.

**(prevailing Eastern Time) on February 3, 2010** (the “**Objection Deadline**”). Only those responses that are timely filed, served and received will be considered at the hearing.

If no objections are timely filed and served with respect to the Motion, the Debtors may, on or after the Objection Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to the Motion, which order may be entered with no further notice or opportunity to be heard offered to any party.

Respectfully submitted,

ERMAN, TEICHER, MILLER,  
ZUCKER & FREEDMAN, P.C.

By: /s/ David M. Eisenberg  
David M. Eisenberg (P68678)  
400 Galleria Officentre, Ste. 444  
Southfield, MI 48034  
Tel: 248/827-4100  
Fax: 248/827-4106  
[deisenberg@ermantericher.com](mailto:deisenberg@ermantericher.com)

DATED: January 19, 2010

David M. Eisenberg  
ERMAN, TEICHER, MILLER,  
ZUCKER & FREEDMAN, P.C.  
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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

<u>In re:</u>	)	<b>Chapter 11</b>
MOTORS LIQUIDATION COMPANY., <i>et al.</i> ,	)	<b>Case No. 09-50026 (REG)</b>
f/k/a GENERAL MOTORS CORP., <i>et al.</i> ,	)	<b>Hon. Robert E. Gerber</b>
<b>Debtors.</b>	)	<b>(Jointly Administered)</b>

**MOTION TO WITHDRAW AS COUNSEL FOR NIDEC MOTORS & ACTUATORS**

Erman, Teicher, Miller, Zucker & Freedman, P.C. (“Erman Teicher”), attorneys of record for Nidec Actuators & Motors (“Nidec”) states for its Motion to Withdraw as Counsel for Nidec Motors & Actuators as follows:

1. On June 29, 2009, Nidec retained Erman Teicher to represent its interests in this proceeding.
2. From the outset of the engagement, Erman Teicher repeatedly requested information from Nidec so that Erman Teicher could file proofs of claims on behalf of Nidec as well as provide counsel with regard to various orders and motions filed in this proceeding. Nidec has not provided any of the requested information and has not communicated with Erman Teicher since mid-July 2009.

3. Erman Teicher has filed estimated unsecured and 503(b)(9) proofs of claim, and has responded to the Debtors Objection to Certain 503(b)(9) Claims [Docket No. 4471]. Erman Teicher has provided copies of the proofs of claims and the aforementioned response to Nidec and repeatedly requested information with which to amend the proofs of claim.

4. On December 8, 2009, Erman Teicher sent correspondence to Nidec summarizing the various actions Erman Teicher has taken on behalf of Nidec in this proceeding, and outlining the firm's previous communication attempts with Nidec in regard to the same. The correspondence requested that Nidec affirmatively state whether it wished to have Erman Teicher continue representing its interests in this proceeding and if not, requested that the company execute an enclosed stipulated order authorizing Erman Teicher to withdraw as counsel. Nidec did not respond to the correspondence.

5. On January 7, 2009, the Debtors filed their Seventh and Ninth Omnibus Objections of Claims (the "Claims Objections") [Docket No.'s 4757 and 4759] in which they objected to the proofs of claims filed by Erman Teicher on behalf of Nidec. The date to provide responses to these objections is February 3, 2010. Erman Teicher provided copies of the objections to Nidec via e-mail, requested information regarding the same, and has not received a response.

6. This Motion is noticed for hearing on February 10, 2010 with a response date of February 3, 2010. Erman Teicher has conferred with Debtors' counsel regarding the upcoming objection deadline to the Claims Objections (February 3, 2010). Debtors' counsel has advised that it will re-notice Nidec and Erman Teicher of the deadline to respond to the Claims Objections to a date not less than 30 days after the February 10, 2010 hearing date on the instant Motion to enable Nidec and/or Erman Teicher to prepare a response to the Claims Objections pending a decision on this Motion.

7. As set forth above, there are a number of issues in this proceeding requiring Nidec's attention and Nidec has been unresponsive to all attempts at communication regarding the same.

8. Their exists a breakdown in communications whereby Erman Teicher and Nidec do not have an attorney/client relationship whereby Erman Teicher will be able to provide Nidec with the representation necessary in this proceeding. Accordingly, Erman Teicher seeks to withdraw as counsel for Nidec pursuant to LBR 2090-1 which permits withdrawal by order of the Court for cause shown.

9. A request to stipulate to the relief requested was sent to Nidec on December 8, 2009, and no response was received.

WHEREFORE, Erman, Teicher, Miller, Zucker & Freedman, P.C. requests that this Court enter an Order in the form attached hereto as Exhibit A;

A. Granting its Motion to Withdraw as Counsel for Nidec Motors & Actuators in this proceeding, and;

B. Granting such other and further relief as the Court deems just and proper.

Respectfully submitted,

ERMAN, TEICHER, MILLER,  
ZUCKER & FREEDMAN, P.C.

By: /s/ David M. Eisenberg  
David M. Eisenberg (P68678)  
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DATED: January 19, 2010

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## **EXHIBIT A**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

<u>In re:</u>	)	<b>Chapter 11</b>
MOTORS LIQUIDATION COMPANY., <i>et al.</i> ,	)	<b>Case No. 09-50026 (REG)</b>
f/k/a GENERAL MOTORS CORP., <i>et al.</i> ,	)	<b>Hon. Robert E. Gerber</b>
<b>Debtors.</b>	)	
	)	<b>(Jointly Administered)</b>

**ORDER AUTHORIZING THE WITHDRAWAL OF  
ERMAN, TEICHER, MILLER, ZUCKER & FREEDMAN, P.C.  
AS COUNSEL FOR NIDEC MOTORS & ACTUATORS**

THIS MATTER is before the Court upon Erman, Teicher, Miller, Zucker & Freedman, P.C.'s Motion to Withdraw as Counsel for Nidec Motors & Actuators (the "Motion"). Notice of the Motion has been duly served upon all required parties and no responses have been filed thereto. The court finds good cause for entry of this order and is otherwise fully advised in the premises,

NOW, THEREFORE;

IT IS HEREBY ORDERED that the law firm of Erman, Teicher, Miller, Zucker & Freedman, P.C. is authorized to withdraw as counsel for Nidec Motors & Actuators in connection with this proceeding.

IT IS FURTHER ORDERED that the withdrawal of Erman, Teicher, Miller, Zucker & Freedman, P.C. as counsel for Nidec Motors & Actuators shall be effective immediately.

Dated: New York, New York  
\_\_\_\_\_, 2010

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United States Bankruptcy Judge